

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE FEDERAL REPUBLIC OF NIGERIA;
ABUBAKAR MALAMI, THE ATTORNEY
GENERAL OF THE FEDERAL REPUBLIC
OF NIGERIA,

Applicants,

v.

VR ADVISORY SERVICES, LTD.; VR
ADVISORY SERVICES (USA) LLC; VR
CAPITAL GROUP, LTD.; VR GLOBAL
ONSHORE FUND, L.P.; VR ARGENTINA
RECOVERY ONSHORE FUND II, L.P.;
RICHARD DIETZ; JEFFREY JOHNSON;
and ASHOK RAJU,

Respondents.

Case No. 1:20-MC-00209-PAE

**RESPONDENTS' NOTICE OF MOTION TO
(I) VACATE ORDER APPROVING DISCOVERY IN AID OF FOREIGN
PROCEEDINGS, (II) QUASH SUBPOENAS, AND (III) STAY DISCOVERY**

PLEASE TAKE NOTICE that, pursuant to 28 U.S.C. § 1782, Rule 45 of the Federal Rules of Civil Procedure, and the Court's memorandum endorsement dated June 23, 2020 (ECF 13), and upon the Memorandum of Law in Support of Respondents' Motion to (I) Vacate Order Approving Discovery in Aid of Foreign Proceedings, (II) Quash Subpoenas, and (III) Stay Discovery; the Declaration of Zachary D. Rosenbaum dated June 26, 2020; and the Declaration of Andrew Stafford QC, Respondents VR Advisory Services Ltd., VR Advisory Services (USA) LLC, VR Global Onshore Fund, L.P., VR Argentina Recovery Onshore Fund II, L.P., Jeffrey Johnson, and Ashok Raju shall move this Court before the Honorable Paul A. Engelmayer, United States District Judge, upon a briefing schedule to be set by the Court, for an order vacating the Court's May 14,

2020 order (ECF 10), quashing in their entirety the subpoenas directed to Respondents, and staying discovery, and for other and further relief the Court deems just and proper.

Dated: New York, New York
June 26, 2020

Respectfully submitted,

KOBRE & KIM LLP

/s/ Zachary D. Rosenbaum

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Petitioner's opposition, if any, is due by July 10, 2020. Respondent's reply is due by July 17, 2020. Section 1782 discovery, previously authorized by this Court's order of May 14, 2020, Dkt. 10, is hereby stayed pending resolution of the motion to vacate. SO ORDERED.



PAUL A. ENGELMAYER 6/29/2020
United States District Judge